

**EPA ID NUMBER VERIFICATION QUESTIONNAIRE (VQ)
AND
EPA ID NUMBER AND MANIFEST FEE ASSESSMENT**

2007 FREQUENTLY ASKED QUESTIONS

Do you have questions about filling out your annual Verification Questionnaire (**VQ**)? To assist you with the verification process this year, the Department of Toxic Substances Control's (**DTSC**) Generator Information Services Section (**GISS**) is offering the following "Frequently Asked Questions" (**FAQs**). By reading through the FAQs, you may be able to avoid having to call GISS during this busy telephone time. The items directly below are the most common issues with the verification process.

- ▶ **Ownership Change - see question #10**
- ▶ **Location Address Change - see question #4**
- ▶ **Fee Questions - see questions #6 through #9**
- ▶ **Manifest Counts - see questions #15 through #17**
- ▶ **Suspended ID Numbers - see question #21**
- ▶ **EPA ID Number Issues - see questions #21 through #24**
- ▶ **SIC Codes - see question #26**
- ▶ **BOE and FEIN ID Numbers – See question #33**

1. **Why does DTSC need this information?** The facility information you provide to get an EPA Identification number is critical for state and local regulators that enforce hazardous waste laws. Health and Safety Code section 25205.16 requires DTSC to verify the accuracy of information related to generators, transporters and facilities authorized to treat, dispose of, store, or recycle hazardous waste. DTSC captures this data through this Verification Questionnaire (VQ) and uses the collected information to ensure that the Hazardous Waste Tracking System (HWTS) database is current and accurate.

The EPA ID Number Verification Fee, which has been established by State legislation, funds this effort.

2. **What forms must I return to DTSC?** Return all the forms you receive.

If you received the VQ package (for permanent ID number holders) you **must return** the VQ (page 1) (whether or not you had any changes), Schedule A (page 3) and Schedule B, along with your payment. Your verification process will not be considered complete if you do not return all forms.

If you received the Manifest Fee Assessment package (for temporary or out-of-state ID number holders), you must return the assessment form along with your payment.

3. **I have been calling and cannot get through to GISS staff. I do not have a question about the verification questionnaire; I need a new EPA ID number.**

For permanent ID numbers, please download the permanent ID number application form from the DTSC website at www.dtsc.ca.gov/ID_Manifest/ID_Numbers.cfm Under Frequently Requested Information on the home page, click on the link for DTSC Form 1358. You will get a set of instructions and an application form.

If you need a Temporary ID number, and you are calling from within California, please call (800) 618-6942. When you hear the recorded message, please press 1 and then 3 to get to an operator. If you are calling from outside California, call (916) 255-1136. When you hear the recorded message, please press 1 and then 3 to get an operator.

4. **My business moved, so the site address on my VQ is different. What should I do?** California EPA ID numbers are issued to one specific site and specific owner. If you moved, you must cancel your current EPA ID number. Check box #6 on the VQ (page 1) and return it with all of the forms so we can finalize your paperwork. In order to apply for a new ID number for your new location, please download the ID application form from the DTSC website at www.dtsc.ca.gov/IDManifest/ID_Numbers.cfm Under Frequently Requested Information on the home page, click on the link for DTSC Form 1358. You will get a set of instructions to follow and an application form to complete.
5. **My VQ shows the property owner as the owner of my business. This is incorrect and I need to change it. The instructions tell me to call GISS if there is a change of ownership. Do I really need to call?** No. Some older EPA ID numbers may list the property owner where the company owner should be listed. Please update the VQ (page 1) with your proper company owner information and make note on that portion of the VQ that the preprinted information referred to the property ownership. We will update your records.
6. **I completed my VQ and fee schedules and I do not owe any fees. Is this possible?** Yes. This is quite common. If your organization has fewer than 50 employees and did not manifest hazardous waste or your business recycled all of your hazardous waste, your fees will be zero. However, ***you are still required to complete and return all forms to DTSC.***
7. **I don't have any corrections or changes to my VQ and don't owe any fees; do I still have to send in my forms?** Yes, ***you must complete and return all forms to DTSC*** even though you don't owe any fees. You are required by law to verify this information every year. Please don't forget to return the VQ (page 1).
8. **I had zero manifests during 2006. Do I still owe \$7.50?** No.

9. **I want to pay my fees by credit card. How do I do that?** Paying by credit card is easy. Fill out the credit card payment form enclosed in your VQ package and submit it with your VQ form, Schedule A and Schedule B. If you received a manifest fee assessment package, you would follow the same steps by submitting your manifest assessment form and credit card payment form. Returning all forms is required whether paying by check, credit card or if you do not owe a fee. Please do not use the standard envelope we provided for credit card payments. Please send Credit card payments and all of your forms to: Accounting Unit, DTSC, P.O. Box 876, Sacramento, CA 95812-0876.

10. **The business name and information shown on the VQ is not mine. What should I do?** If the EPA ID number begins with “CAL” and you have been using the previous owner’s EPA ID number, you must stop using it immediately, and apply for your own ID number. To apply for a new permanent ID number for your business, please download the ID application form from the DTSC website at www.dtsc.ca.gov/IDManifest/IDNumbers.cfm Under Frequently Requested Information on the home page, click on the link for DTSC Form 1358. You will get a set of instructions to follow and an application form to complete.

You must, however pay for any manifests that you generated using the previous owner’s ID number. You must also correct those manifests. Please see question number 32 below on how to prepare a Manifest Correction Letter.

Prior to returning the forms to DTSC, please make a note on page 1 of the VQ that this is not your ID number for this location. If you obtained a new number recently, you should have also received a VQ for your own EPA ID number. Please complete those forms and return them to DTSC.

Finally, if the EPA ID number on the VQ begins with “CAD”, “CAR” or “CAT”, please update the information on the VQ. Federal EPA ID numbers are site specific and may be transferred to a new owner at the site. You must also contact U.S. EPA with your updated information. You can reach U.S. EPA at (415) 495-8895.

11. **I received a manifest fee assessment only, but no VQ. Why?** DTSC only verifies permanent ID numbers and numbers for California locations. If you manifested during calendar year 2006 using an EPA ID number starting with “CAC” or “CAP” (temporary) or you have an out of state EPA ID number or you inactivated your EPA ID number during 2006, you are not required to verify your information or pay the EPA ID number verification fee. You are only required to pay the manifest fee and return in the enclosed envelope.

12. **I recently inactivated my number but I still received a VQ. Why?** If your number had manifest activity on it during calendar year 2006, you will receive a

VQ regardless of whether your number is active or inactive. If you *recently* inactivated your number, you will still receive a VQ if the number was active at any time during the fiscal year of 2006/2007 (July 1, 2006 – June 30, 2007). In order to complete the VQ process, please complete and return all forms.

13. **My EPA ID number was issued by a state other than California. Do I need to pay the EPA ID Number Verification Fee?** No. California cannot assess the Verification Fee for out-of-state numbers.. However, you are required to pay manifest fees for Manifests used on this EPA ID number during calendar year 2006.
14. **I noticed that there is no pre-printed owner information and contact information on my VQ. Should I call GISS about it?** No. Simply fill in the missing information on the right hand side of the VQ. We will update our database with the information you provide.
15. **DTSC shows a different manifest count on my VQ than in my records. What should I do?** If you believe the manifest count shown on Schedule A is incorrect, you may use the count from your own files. However, please be aware that any difference between the manifest counts you report and the manifest counts printed on Schedule A is subject to audit by DTSC.
16. **DTSC shows a manifest count of zero, yet I had several pick ups of hazardous waste during 2006. Why?** Your hazardous waste hauler may be removing your waste on a consolidated manifest instead of a regular manifest. In this procedure, your hauler assumes responsibility as the generator of the waste and manifests it on their EPA ID number. You are not responsible for manifest fees for manifests in which you are not the generator. If your transporter used a consolidated manifest, they are required to give you a receipt. Check with your hauler to see if they are operating as a consolidated manifestor.
17. **DTSC shows different recycled and non-recycled manifest counts than in my records. What should I do?** If you believe the recycled and non-recycled manifest counts are incorrect, you may use the counts from your own records. However, please be aware that any difference between the recycled and non-recycled counts you report and the counts printed on Schedule A is subject to audit by DTSC. To qualify as a recycled manifest, all lines of waste on the manifest must be recycled. The receiving facility adds a code to the manifest to indicate it was recycled at their facility. The recycling code was 01 before September 5, 2006 and is now either codes H010, H020, H039, H050, or H061. See the Supplemental California Manifest Instructions for detailed descriptions. In some cases, the initial receiving facility only transfers waste to a different facility that may recycle or otherwise handle the waste. If you claim that waste was recycled that is not documented on a manifest, DTSC may ask for additional documentation.

- 18. I am not sure if my hazardous waste was recycled or not. How can I check on this?** Check item K on your California manifests. If all the blocks for the waste streams have a "R01" or "01". Check item 19 on your federal manifests. If all the blocks for the waste streams have a "H010, H020, H039, H050 or H061" you may count the waste as recycled. You can also contact your hazardous waste hauler or disposal facility to see if your waste was recycled at a subsequent facility.
- 19. I see the category "air compliance solvents" on Schedule A? What is this?** On January 1, 1999 many businesses were required to switch from petroleum-based solvents to air compliance solvents (also called water-based cleaners). The Health and Safety Code section 25205.15 (c) was modified and the fee for a manifest used solely for the hazardous waste derived from air compliance solvents was reduced from \$7.50 to \$3.50. Most air compliance solvents are now recyclable. Therefore, businesses manifesting air compliance solvents on manifests used solely for recycling would not have to pay the manifest fee for those manifests. Manifests used solely for waste derived from air compliance solvents that were not recycled cost \$3.50.
- 20. I received my VQs at several different mailing addresses and have had difficulty tracking them down. Is there something I can do to prevent this from happening again?** Yes. DTSC provides a service to companies with many locations. Provide DTSC with one consolidated mailing address at the top of the VQs and one contact person in item 8 on the VQs. This will ensure that future VQs are mailed in a single package. This also gives DTSC a single point of contact for your company or agency, should questions arise.
- 21. The VQ shows that my EPA ID number has been suspended. What does this mean?** Your number may have been inactivated because DTSC did not receive a VQ from your company in the past, or a VQ package may have been returned to DTSC as nondeliverable by the post office. If the word "Suspended" appears next to your ID Number, in the shaded box, the ID Number is not active. If the information is incorrect and your ID Number needs to be reactivated, please download the ID application form from the DTSC website at www.dtsc.ca.gov/IDManifest/IDNumbers.cfm. Under Frequently Requested Information on the home page, click on the link for DTSC Form 1358. There is a set of instructions and an application form for your use.
- 22. I have several EPA ID numbers. Do I have to pay the EPA ID number verification fee rate for each of my ID numbers?** Yes, up to a limit of \$5,000. Use the chart on Schedule B to determine the fee rate for your company based upon the total number of full time employees in California in your organization, not at each location. An employee must have worked more than 500 hours during the calendar year 2006 to be included in your calculation. Organization is defined as a registered corporation, sole proprietor,

partnership or company. For public agencies, “organization” is defined as a city, county, commission, agency, department or district. After determining the total number of California employees, refer to the chart and multiply the rate by the number of EPA ID numbers held by your organization. If the result exceeds \$5,000, pay the maximum verification fee of \$5,000.

23. **Do I count temporary/part-time employees?** An employee must have worked more than 500 hours during the calendar year 2006 to be included in your total.
24. **I have received a form that has an EPA ID number beginning with “CAC”. What is this form for?** EPA ID numbers with a prefix “CAC” are California temporary numbers that are issued to businesses, homeowners, property owners that have a one time disposal of hazardous waste. Temporary numbers are only good for 90 days from the date it was issued: If you are a property or homeowner, you may have had work or improvements done on your home, building or property. As a result of this work, hazardous waste was generated and a hazardous waste manifest was used to track the disposal of the hazardous waste. This form/assessment is used to determine if you owe manifest fees.
25. **I have several EPA ID numbers for various sites in California, but did not receive a VQ or manifest assessment for each site. What should I do?** You should receive a VQ or manifest assessment for each California EPA ID number that was active during fiscal year 2006/2007 or manifested during calendar year 2006. You should check with each site or location to determine if the VQ was mailed to them. If they did not receive the VQ, you should call GISS at (877) 454-4012 if you are dialing within California or (916) 255-4439 if you are outside California and to talk to an operator.
- Please do not re-create forms and fill in your own information. Re-created VQ forms will be rejected. This will delay your verification process.
26. **What is the SIC code requested in Item 9?** The Standard Industrial Classification (SIC) code is a 4 digit number that best describes your company’s primary business activity. If you do not know your SIC code, you can look it up on the Internet at www.osha.gov/oshstats/sicser.html You may also find your SIC code in your business plan.
27. **I want to send in my paperwork by overnight mail. What address should I send it to?** The address for overnight mail is: Accounting Unit, EPA ID, Department of Toxic Substances Control, 1001 I Street, Sacramento, CA 95814.
28. **I sent in my VQ but forgot to enclose a payment. What do I do?** You can send in your payment with a letter stating that you sent in your VQ but not your

payment. The letter must include your EPA ID numbers, business name, phone number, your name and signature. If you did not include your fee schedules with your VQ include them with your letter and payment.

29. I have read the FAQs and instructions in the package, but I still need help filling out my forms and fee schedules. DTSC's Generator Information Services Section Telephone Information Center staff is available Monday through Friday from 8:30 am to 4:30 pm, Pacific Standard Time. Please call the information number listed on your VQ, toll free at (877) 454-4012 if calling from within California or (916) 255-4439 if calling from outside California

30. What is the Department of Toxic Substances Control's tax ID number?
The tax ID number is 68-0281381.

31. I heard I can check my facility information online, how can I do this?
DTSC's Hazardous Waste Tracking System (HWTS) allows a user to search ID information online and access 10 public reports. On the Internet go to www.hwts.dtsc.ca.gov and click on reports.

32. I need to write a Manifest Correction Letter. How do I do this? You can submit a manifest correction in writing and send it to DTSC, Generator Information Services Section, Attention: Manifest Correction, P.O. Box 806, Sacramento, CA 95812-0806. You may submit one letter with an attached list or spreadsheet if you have multiple manifests with the same error. Include the following information on your company letterhead:

- (1) State Manifest Document Number. either 8-digits (Pre-Sept.5, 2006, DTSC 8022A) or 12 digits (on or after September 5, 2006, EPA 8700-22).
- (2) Generator Date; the date the generator signed the manifest.
- (3) Generator EPA ID number used on original manifest, even if it is incorrect.
- (4) The incorrect or incomplete item numbers from the manifest.
- (5) The correct information.
- (6) Signature, title, mailing address and phone number of person submitting the correction.

One MCL that corrects several manifests is sufficient provided it contains items 1 – 5 above for each manifest. If an identical mistake was made on several manifests, simply provide DTSC with a description of the error(s) and/or omission(s) and needed correction(s) followed by a list of the affected Federal Manifest Document Numbers and their ship dates. Please do not attach copies of manifests to MCLs.

If the incorrect information is simply a discrepancy between the quantity or type of waste designated on the manifest, and the quantity or type of waste the Treatment, Storage, or Disposal Facility (TSDF) actually receives, an MCL is not necessary.

Please send MCLs to the
Department of Toxic Substances Control,
Generator Information Services Section,
Attention: GISS-Manifest Corrections
PO Box 806, MS R1-4,
Sacramento, CA 95812-0806.

33. **What are a federal employer number and a BOE number and why does DTSC need this information?** DTSC regulates over 100,000 generators, many of which owe fees to DTSC or the State Board of Equalization. These numbers are needed to be able to trace businesses for fee purposes. DTSC is authorized to collect both of these numbers under Health and Safety Code section 25610.16(b) (1).

If after reading this information you need assistance, you may contact DTSC toll free at (877) 454-4012 if calling from within California or (916) 255-4439 if calling from outside California

FEIN: "On File" indicates that you have previously provided us with a FEIN number. Chances are your business already has a Federal Employer identification number (FEIN). This is a number that is given to a business that identifies a business entity. Generally, businesses need an FEIN. Often times, a one- person business may use their Social Security number as their FEIN. Information can be found on the IRS website at <http://www.irs.gov/businesses/small/article/0,,id=98350,00.html>

BOE Number: If your business generates or produces five (5) or more tons of hazardous waste per calendar year, regardless of the final disposition of the waste, you should have a Board of Equalization (BOE) number, otherwise known as a generator fee account number. If you do not have a BOE number, please leave this space blank and send in all of your VQ forms and payment, if any is due.

If you need a BOE number, please contact BOE at (916) 323-9555 or toll free at 800-400-7115. Please do not delay in sending in your completed VQ forms and payment if you are waiting on a BOE number. You can notify DTSC later when you receive your BOE number. You can find additional information on the BOE website at www.boe.ca.gov

THANK YOU FOR COMPLETING YOUR 2007 VERIFICATION
QUESTIONNAIRE AND FEE SCHEDULES.